

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ALPER KARAALI,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

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CIVIL ACTION NO. 4:15-cv-3454

**INDEX OF MATTERS BEING FILED SUPPORTING DEFENDANT UBER  
TECHNOLOGIES, INC.'S NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §1446, in support of its Notice of Removal, Defendant Uber Technologies, Inc. provide the Court with the attached documentation:

<b>Exhibit</b>	<b>Description</b>	<b>Date</b>	<b>APP</b>
1	Case Summary Sheet	11/23/15	1-2
2	Original Petition	10/22/15	3-8
3	Affidavit of Indigency	10/22/15	9-11
4	Exhibit 1 to Petition	10/22/15	12-15
5	Exhibit 2 to Petition	10/22/15	16-18
6	Exhibit 3 to Petition	10/22/15	19-22
7	Civil Case Information Sheet	10/22/15	23-24
8	Civil Process Request	10/22/15	25-26
9	Citation	10/30/15	27-30
10	Defendant's Original Answer and Affirmative Defenses	11/20/15	31-35
11	Declaration of Michael Colman in Support of Defendant's Removal of Civil Action From State Court	11/23/15	36-37

Dated: November 24, 2015

Respectfully submitted,

s/ Vicki L. Gillette

Vicki L. Gillette

Texas Bar No. 08957325

[vgillette@littler.com](mailto:vgillette@littler.com)

Jonathan G. Rector

Texas Bar No. 24090347

[jrector@littler.com](mailto:jrector@littler.com)

LITTLER MENDELSON, PC

2001 Ross Avenue

Suite 1500, Lock Box 116

Dallas, TX 75201-2931

214.880.8100

214.880.0181 (Facsimile)

ATTORNEYS FOR DEFENDANT

UBER TECHNOLOGIES, INC.

### **CERTIFICATE OF SERVICE**

On November 24, 2015, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas, using the Case Management/Electronic Case Filing System (CM/ECF). I hereby certify that I have served by certified mail, return-receipt requested, the following party:

Alper Karaali, *pro se*  
538 Ivy Cross Lane  
Sugar Land, TX 77479

s/ Vicki L. Gillette

Vicki L. Gillette

# Exhibit 1

11/23/2015

Office of Harris County District Clerk - Chris Daniel

HCDistrictclerk.com

KARAALI, ALPER vs. UBER TECHNOLOGIES INC

11/23/2015

Cause: 201563015 CDI: 7 Court: 151

**APPEALS**

No Appeals found.

**COST STATMENTS**

No Cost Statments found.

**TRANSFERS**

No Transfers found.

**POST TRIAL WRITS**

No Post Trial Writs found.

**ABSTRACTS**

No Abstracts found.

**SETTINGS**

No Settings found.

**NOTICES**

No Notices found.

**SUMMARY****CASE DETAILS**

<b>File Date</b>	10/22/2015
<b>Case (Cause) Location</b>	Civil Intake 1st Floor
<b>Case (Cause) Status</b>	Active - Civil
<b>Case (Cause) Type</b>	OTHER CIVIL
<b>Next/Last Setting Date</b>	N/A
<b>Jury Fee Paid Date</b>	N/A

**COURT DETAILS**

<b>Court</b>	151 <sup>st</sup>
<b>Address</b>	201 CAROLINE (Floor: 11) HOUSTON, TX 77002 Phone:7133686222
<b>JudgeName</b>	MIKE ENGELHART
<b>Court Type</b>	Civil

**ACTIVE PARTIES**

Name	Type	Post Attorney Jdgm
KARAALI, ALPER 538 IVY CROSS LANE, SUGAR LAND, TX 77479	PLAINTIFF - CIVIL	
UBER TECHNOLOGIES INC 5714 STAR LANE, HOUSTON, TX 77057	DEFENDANT - CIVIL	RECTOR, JONATHAN GARY

**INACTIVE PARTIES**

No inactive parties found.

11/23/2015

Office of Harris County District Clerk - Chris Daniel

**JUDGMENT/EVENTS**

Date	Description	Order Signed	Post Jdgm	Pgs Volume /Page	Filing Attorney	Person Filing
11/20/2015	ANSWER ORIGINAL PETITION		0		RECTOR, JONATHAN GARY	UBER TECHNOLOGIES INC
10/22/2015	ORIGINAL PETITION		0			KARAALI, ALPER
10/22/2015	PAUPER'S OATH		0			KARAALI, ALPER

**SERVICES**

Type	Status	Instrument	Person	Requested	Issued	Served	Returned	Received	Tracking	Deliver To
CITATION SERVICE	ORIGINAL RETURN/EXECUTED PETITION	UBER TECHNOLOGIES INC	10/22/2015	10/22/2015	10/28/2015				73181212	CONST 1 ALAN ROSEN

**DOCUMENTS**

Number	Document	Post Jdgm	Date	Pgs
67978911	Defendant's Original Answer and Affirmative Defenses		11/20/2015	4
67694112	Citation		10/30/2015	3
67560306	Original Petition		10/22/2015	5
-> 67560357	1.Exhibit 1		10/22/2015	3
-> 67560358	1.Exhibit 2		10/22/2015	2
-> 67560359	1.Exhibit 3		10/22/2015	3
-> 67560347	Affidavit of Indigency		10/22/2015	2
-> 67560361	Civil Process Request		10/22/2015	1
-> 67560360	Civil/Family Case Information Sheet		10/22/2015	1

# Exhibit 2

CONFIRMED FILE DATE: 10/22/2015

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging

p. 5  
**FILED**  
Chris Daniel  
District Clerk  
OCT 22 2015  
Time: 11:53  
By: [Signature]  
Harris County, Texas  
Deputy

CAUSE NO : 2015 63015

Plaintiff,

Alper Karaali

v.

Defendant.

IN THE DISTRICT COURT OF

HARRIS COUNTY TEXAS

151 JUDICIAL DISTRICT

Uber Technologies, Inc.

## INTRODUCTION

Alper Karaali applied to become Uber partner and accepted on Oct 2014. Drives his own car, Nissan Armada 2010 and responsible all the expenses, including fuel, insurance and maintenance. Plaintiff's car listed as Uber XL, according to size of the vehicle. Uber sends signal to Plaintiff's smart phone app. when there is request from a customer and Plaintiff gives the customer ride. Charges made directly to the customer by Uber and share of charge paid to the Plaintiff by Uber following week. There is no money exchange between Plaintiff and customer. According to Uber's representation, there is no interference by Uber for which customer calls goes to which driver, whole system works independently by app. Plaintiff works as independent contractor for Uber.

## DISCOVERY CONTROL PLAN

Plaintiff intends to conduct discovery pursuant to level 2 of Texas Rule of Civil Procedure 190.3.

#### **PARTIES**

**Plaintiff, Alper Karaali, Pro Se.**

**Address: 538 Ivy cross lane Sugar Land TX, 77479. Ph. 281-704-0052,  
e-mail : atkaraali@aol.com.**

**Defendant , Uber Technologies inc.**

**Address: 5714 Star Lane, Houston TX, 77057**

#### **JURISDICTION**

**The Court has jurisdiction over this lawsuit because the amount in controversy exceeds this Court's minimum jurisdictional requirements.**

#### **VENUE**

**Venue is proper in Harris County , Texas because all of the events giving rise to the claims occurred or connected to in Harris County, Texas.**

#### **JURY DEMAND**

**Plaintiff, Alper Karaali respectfully demands jury trial.**

#### **CLAIM**

**Plaintiff seeks total damages within the jurisdictional limits if this Court but not to exceed \$3,000,000.**

### FACTUAL BACKGROUND

During the sign up process, Uber represented that Plaintiff is an independent contractor, free to drive whenever he wants, wherever he wants (exhibit 1). Plaintiff is residing in Sugar Land and wanted to work in this town. Uber continuously put pressure on Plaintiff to drive in Houston area, specifically in Galleria, West University and Downtown area. Uber also start sending Uber X calls ,designed for small cars ,with the charge amount half of the Uber XL cars. Uber claimed that Plaintiff must accept X calls.

Plaintiff's car Nissan Armada and average gas mileage is 14 miles/gallon. Uber continuously sent calls to Plaintiff 15-20 miles away with the charge of \$5. For any ride's charge Uber supposed to gets %20 for X and %28 for XL. In fact Uber was receiving \$2 out of that \$5, which is %40. Plaintiff was driving 20-30 miles, spending \$4-6 gas and about an hour, ending up getting paid \$3 to able to make \$2 for Uber. Plaintiff's countless complaints disregarded by Uber.

Beginning of 2015, Uber made an agreement with City of Houston. According to this agreement all the Uber cars and drivers must obtain license from City to able to drive inside the Houston city limits. Plaintiff obtained such license, paid for the cost. Sometime on June-July 2015, after a Hobby airport ride, City of Houston employee took out Plaintiff's license from his car's windshield and asked him to get a new one. Plaintiff complained to Uber but they did nothing. When Plaintiff applied to City for renewal , it was rejected. Plaintiff complained to Uber once more and decided to drive outside of the City of Houston limits to prevent City's abuse. Uber agreed (exhibit 2).

As the Uber instructed, Plaintiff was not accepting any calls from City of Houston. Since the signal goes the closest car and Uber did not put any block to Plaintiff's app for not to receive signal from City of Houston,

sometimes Plaintiff was receiving calls from Houston even he wasn't in the limits of Houston because of close proximity.

Plaintiff wasn't accepting these calls coming from City of Houston because Uber told him must not. Uber deactivated Plaintiff on Sep 8, 2015 for 48 hours, saying that Plaintiff's acceptance rate is low (exhibit 3). Uber asked Plaintiff to increase acceptance rate and continuously asked him to go Houston on busy days like weekends and on special event days. Plaintiff avoid going Houston but stop rejecting Houston calls, even he is not in the City of Houston, able to increase acceptance rate, according to Uber's suggestions. Uber did not objected until Oct 13, 2015 but suddenly on that day blocked Plaintiff's app., showing reason of acceptance for Houston call.

#### PLAINTIFF SUES FOR

##### Tortious Interference With Contract / Relationship

Uber forced Plaintiff worked in City of Houston while must not. Deactivated Plaintiff when he didn't, asked him do. Blocked his app. when he did, told him he should not. Prevent him to earn income that most needed.

##### Negligent Misrepresentation

Uber gave contract to Plaintiff and showed him his earning percentage would be %72 for UberXL rides and %80 for Uber X rides, but most of the time paid less percentage.

### Deceptive Trade Practices

Uber failed to put distance limit to the calls which was sent to the Plaintiff and forced him to accept for their own financial gain, knowing that Plaintiff would lose money. Uber forced Plaintiff accept uberX calls for smaller cars, knowing that it wouldn't be economical for his big car. Uber failed to pay for cancelled or not showed up rider calls to the Plaintiff, in spite of Uber declared they will on their contract.

### PRAAYER

Plaintiff respectfully request that The Court enter judgment against to Defendant for the fallowing,

- a- Actual loss of income,
- b- Damages because of loss of income,
- c- Exemplary damages,
- d- Pre-judgment and post-judgment interest,
- e- Future loss of income,
- f- Mental and emotional pain, suffering and anguish.

Dated Oct 21, 2015

Respectfully submitted,



Alper Karaali, Plaintiff  
538 Ivy cross lane  
Sugar Land TX, 77479  
ph. 281-704-0052



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560306 Total Pages: 5

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 3

APP 009

## ⑤ About my dependents: The people who depend on me financially are listed below:

- 1 Label Karadi - Daughter
- 2 Michelle Karadi - Daughter
- 3 \_\_\_\_\_
- 4 \_\_\_\_\_
- 5 \_\_\_\_\_
- 6 \_\_\_\_\_

⑥ "My property includes:	Value*	⑦ "My monthly expenses are:	Amount
Cash	\$ 20	Rent/house payments/maintenance	\$
Bank accounts, other financial assets	\$ 83	Food and household supplies	\$ 1000
	\$	Utilities and telephone	\$ 600
	\$	Clothing and laundry	\$
	\$	Medical and dental expenses	\$ 200
Vehicles (cars, boats) (List make and year)	\$ 10,000	Insurance (life, health, auto, etc)	\$ 400
	\$	School and child care	\$ 600
	\$	Vehicle payments	\$ 600
	\$	Gas, bus fare, auto repair	\$ 400
Real estate (house or land) (Do not list the house you live in.)	\$ 0	Child / spousal support	\$
	\$	Wages withheld by court order	\$
	\$	Debt payments	\$
Other property (like jewelry, stocks, etc.) (Describe)	\$ 0	Other expenses (Describe)	\$
	\$		\$
	\$		\$
Total value of property →	= \$ 10,103	Total monthly Expenses →	= \$ 3,800

⑧ "My debts include: Approx \$ 1,000,000 Judgments

Do not list debts owed to family members, friends, or other persons who are not creditors. Do not include debts owed to yourself. Do not include debts owed to the State of Texas, including but not limited to taxes, fines, or penalties. Check here if you attach another page.

⑨ "I am unable to pay court costs. I verify that the statements made in this affidavit are true and correct."

⑩ Your Signature.

[Signature]

10/15/2015

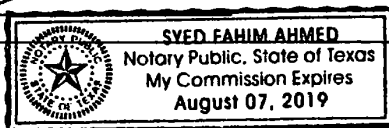
State of Texas

County of FORB BEND

Print the name of county where the Affidavit is prepared.

Sworn to and subscribed before me today, 10/15/2015 by SYED FAHIM AHMED

Print the name of person whose signature is being attested.





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560347 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 4

Sign Up To Drive With Uber - Earn Cash With Your Car

Page 1 of 3

**RECORDER'S MEMORANDUM**  
 This instrument is of poor quality  
 at the time of imaging

NOT INTERESTED IN DRIVING? SIGN UP TO RIDE ([HTTPS://GET.UBER.COM](https://get.uber.com))


P.3

## SIGN UP TO DRIVE

ALREADY HAVE AN ACCOUNT?

(/LOGIN/)

OR CREATE A NEW ACCOUNT

First Name	Last Name
name@example.com	
Phone	
Password (At least 5 characters)	
City	
Invite Code (optional)	
Where did you hear about us? 	

NEXT

☐ I PLAN TO DRIVE A LIVERY OR TAXI VEHICLE.

By proceeding, I agree that Uber or its representatives may contact me by email, phone, or SMS (including by automatic telephone dialing system) at the email address or number I provide, including for marketing purposes. I have read and understand the relevant Driver Privacy Statement.  
 (<https://www.uber.com/legal/privacy/drivers-us>)

EXHIBIT

1

<https://get.uber.com/drive/>

10/20/2015

APP 012

CONFIRMED FILE DATE: 10/22/2015

Certified Document Number: 67560357 - Page 1 of 3

Sign Up To Drive With Uber - Earn Cash With Your Car

Page 2 of 3

## MAKE GOOD MONEY.

Got a car? Turn it into a money machine. The city is buzzing and Uber makes it easy for you to cash in on the action. Plus, you've already got everything you need to get started.

## DRIVE WHEN YOU WANT.

Need something outside the 9 to 5? As an independent contractor with Uber, you've got freedom and flexibility to drive whenever you have time. Set your own schedule, so you can be there for all of life's most important moments.

Sign Up To Drive With Uber - Earn Cash With Your Car

Page 3 of 3

## NO OFFICE, NO BOSS.

Whether you're supporting your family or saving for something big, Uber gives you the freedom to get behind the wheel when it makes sense for you. Choose when you drive, where you go, and who you pick up.



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560357 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 5

[Uber] Re: TNC

Page 1 of 2

**RECORDER'S MEMORANDUM**  
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at the time of imaging

P. 2

**From:** Alicia (Uber Partner Support) <partnershouston@uber.com>

**To:** Albert Karaali <atkaraali@aol.com>

**Subject:** [Uber] Re: TNC

**Date:** Wed, Jul 15, 2015 5:36 pm

U B E R

##- Please type your reply above this line -##

Your request (45169781) has been updated. To add additional comments, reply to this email.

**Alicia (Uber)**

Jul 15, 15:36

Hello Albert,

Alicia here, happy to help!

I have adjusted your account to reflect that you do not want to drive within the Houston city limits. As a reminder, you may drop off passengers in Houston but you cannot pick up, after dropping them off please go offline and head back out of the city to continue driving.

The Houston team is monitoring all pick ups, if we see one from your account within the city limits you will be wait listed until the permit is uploaded.

If there is anything else I can do to be helpful, please don't hesitate to let me know.

Alicia

help.uber.com

**Albert Karaali**

Jul 13, 15:28

Hello,

I received email regarding TNC licence fee. I don't have TNC licence anymore, for that reason no charges should apply to my account. My TNC licence taken away from my windshield by city employee. When I go to renew and waiting 2 hours , city employee didn't accept my registration sticker or registration paper that I used for getting Airport licence. They suggested me to go to fort

EXHIBIT  
2

[Uber] Re: TNC

Page 2 of 2

bend court and get registration paper .

As you should recall, I sent you email, I do not want to deal with this garbage city of houston, I live in Sugar Land and I want to operate only in Sugar Land, katy, richmond, Rosenberg, Stanford and Missouri city Tx. If I have a rider goes to houston or the airport, I'll drop and get out of Houston city limits.

Sent from AOL Mobile Mail

This email is a service from Uber.

Message-Id:NN4NBAXE\_55a6e08276c5b\_62643fc319ecd328376d4\_sprut



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560358 Total Pages: 2

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 6

[Uber] Re: Re: UBER: Acceptance Concerns

Page 1 of 3

**From:** Mary (Uber Partner Support) <partnershouston@uber.com>  
**To:** Albert Karaali <atkaraali@aol.com>  
**Subject:** [Uber] Re: Re: UBER: Acceptance Concerns  
**Date:** Tue, Sep 8, 2015 4:36 pm

RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging

P.3

U B E R

##- Please type your reply above this line -##

Your request (59697825) has been updated. To add additional comments, reply to this email.

**Mary (Uber)**

Sep 8, 14:36

Hi Albert,

Thank you for your email regarding your temporary account deactivation. I am sorry to hear about this experience.

A low acceptance rate creates poor customer experiences for our customers as well as partners. Email was sent to you several times regarding your acceptance rate to make you aware of your status and hopefully help you to improve it. I know that this is frustrating but it is just a temporary deactivation and you can get back on the road again on **2015-09-10 at 12 PM**.

Please use the below pro-tips to improve your acceptance rate after your deactivation period

**Pro-Tip #1:** Only log online on the Uber app when you are in your vehicle and ready to take a trip.

**Pro-Tip #2:** Always double check that you are offline and the app is closed before stopping driving.

If there is anything else I can help you with, please don't hesitate to reach out.

Best,

Mary  
help.uber.com

EXHIBIT  
3

**Albert Karaali**

[Uber] Re: Re: UBER: Acceptance Concerns

Page 2 of 3

Sep 8, 13:59

Dear Uber team,

After completing my last trip around 2:00 pm today, I received a download to my app and couldn't go online after that. I found out that you sent me e mail at 11:00 am for 48 hours deactivation with no prior notice to cure. Texas law applies to our contract and requires 30 days notice to cure if any default exist. Without giving any notice to cure and deactivating my account with your sole decision you are breaching the contract.

Take notice this e mail as legal notice and activate my account upon receipt.

As it might forgotten, I'm no longer drive Uber in city of Houston limits. As Uber instructed and we are agree, if I receive request from Houston, I will reject to protect UBER's contract with city of Houston. I followed your instructions promptly.

- Sometimes after I dropped my rider inside the city limits, I received another request before I got chance to go offline and I did not take this call as instructed

- Sometimes In spite of I'm out of city of Houston limits, still get request from Houston because of close distance but I did not take it as instructed.

Both of this case might increase my non acceptance rate which I don't like and in the future if UBER's agreement with Houston changes, I will gladly take this calls. Purpose of this rejection to protect Uber's contract with City of Houston and not to take advantage of the App's signal.

- I also reject request if I had bad experience with the caller previously to prevent escalation of further problems, also prevent legal liability for Uber.

-Only instance might be arguable when request comes from very far distance ( 20 miles or more) as of X since my car is XL (Nissan Armada) and I realize that 17-18 minutes time given to reach to destination won't be enough and also economical.

Otherwise I remained loyal to Uber all this time, even not pursue any legal remedies against to City of Houston when I abused by them, just to protect Uber's contract. I'm expecting immediate activation.

Kind regards.

Sent from AOL Mobile Mail

-----Original Message-----

From: Uber <email@et.uber.com>

To: atkaraali <atkaraali@aol.com>

Certified Document Number: 67560359 - Page 2 of 3

[Uber] Re: Re: UBER: Acceptance Concerns

Page 3 of 3

Sent: Tue, Sep 8, 2015 11:00 AM  
 Subject: UBER: Acceptance Concerns

<div id="AOLMsgPart\_1\_6463481a-be7c-43e0-867f-d0de932f21f2"  
 style="margin: 0px;font-family: Tahoma, Verdana, Arial, Sans-Serif;font-size:  
 12px;color: #000;background-color: #fff;">

<pre style="font-size: 9pt;"><tt>Hello --

Uber takes trip acceptance rates very seriously and your account  
 has been identified as having an acceptance rate far below your peers. Based  
 on  
 this information your account has been temporarily deactivated for 48  
 hours.

Each ride request is sent to the nearest vehicle to a rider on Uber  
 and therefore a lower acceptance rate creates higher ETAs for our partners and  
 riders. Higher ETAs create poor experiences for customers and lower earnings  
 for  
 our partners.

Your account will be reactivated by Thursday at 12PM. If we do  
 not see a significant increase in your trip acceptance rate your account will  
 face permanent deactivation.

Regards,

Team Uber

</tt></pre>

<!-- end of AOLMsgPart\_1\_6463481a-be7c-43e0-867f-d0de932f21f2 -->

</div>

This email is a service from Uber.

Message-Id:Q9TGCR1C\_55ef54dd5faa8\_712a3fc336acd32815019b\_sprut



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560359 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 7

CIVIL CASE INFORMATION SHEET (REV. 10/15/14)  
 CAUSE NUMBER (FOR CLERK USE ONLY) **2015 63015** COURT (FOR CLERK USE ONLY): 151

STYLED

(e.g. John Smith v. All American Insurance Co. In re Mary Ann Jones. In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

<b>1. Contact information for person completing case information sheet</b> Name: <u>Alper Karacali</u> Email: <u>Atkaracali@aol.com</u> Address: <u>538 Ivy Cross Ln.</u> Telephone: <u>281-704-0052</u> City/State/Zip: <u>Sugar Land, TX 77479</u> Fax: _____ Signature: _____ State Bar No.: _____		<b>Names of parties in cases</b> Plaintiff(s) Petitioner(s): <u>Alper Karacali</u> Defendant(s) Respondent(s): <u>Uber Technologies Inc.</u> [Attach additional pages as necessary to list all parties.]		<b>Person or entity completing sheet is:</b> <input type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ <b>Additional Parties in Child Support Case</b> Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____	
<b>2. Indicate case type, or identify the most important issue in the case (select only 1)</b>					
<b>Civil</b> <b>Contract</b> <input type="checkbox"/> Debt Contract <input type="checkbox"/> Consumer DTPA <input type="checkbox"/> Debt Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt Contract <b>Foreclosure</b> <input type="checkbox"/> Home Equity Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract		<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <input type="checkbox"/> Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability <input type="checkbox"/> 1st Product <input type="checkbox"/> Other Injury or Damage: _____		<b>Real Property</b> <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Prepass to Try Title <input type="checkbox"/> Other Property: _____ <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____		<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <input type="checkbox"/> Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____		<b>Probate &amp; Mental Health</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____		<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b> <input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment <input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover					
<b>4. Indicate damages sought (do not select if it is a family law case):</b> <input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000					

**FILED**  
 Chris Daniel  
 District Clerk  
 OCT 22 2015  
 Time: 11:52  
 Harris County, Texas  
 Deputy: C. Daniels

CONFIRMED FILE DATE: 10/22/2015

Certified Document Number: 67560360 - Page 1 of 1



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560360 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 8

## CIVIL PROCESS REQUEST

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING  
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

CASE NUMBER: 2015 63015 CURRENT COURT: 151

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): \_\_\_\_\_

FILE DATE OF MOTION: \_\_\_\_\_  
Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: UBER Technologies Inc  
ADDRESS: 5714 Star Lane Houston TX, 77057  
AGENT, (if applicable): OFFICE HOURS: Tue, Wed, Thur 10am-5pm, Fri 10am-3pm

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☒ CONSTABLE  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ MAIL ☐ CERTIFIED MAIL  
☐ PUBLICATION:  
Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

\*\*\*\*\*  
FILED  
Chris Daniel  
District Clerk  
OCT 22 2015

2. NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_ Time: 11:53  
AGENT, (if applicable): \_\_\_\_\_ By: Chris Daniel  
Harris County, Texas  
Deputy

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): \_\_\_\_\_

SERVICE BY (check one):

- ☐ ATTORNEY PICK-UP ☐ CONSTABLE  
☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: \_\_\_\_\_ Phone: \_\_\_\_\_  
☐ MAIL ☐ CERTIFIED MAIL  
☐ PUBLICATION:  
Type of Publication: ☐ COURTHOUSE DOOR, or  
☐ NEWSPAPER OF YOUR CHOICE: \_\_\_\_\_  
☐ OTHER, explain \_\_\_\_\_

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: Alper Karak TEXAS BAR NO./ID NO. Pre Se  
MAILING ADDRESS: 538 Ivy Cross Ln Sugar Land TX 77479  
PHONE NUMBER: 281 704-8852 FAX NUMBER: \_\_\_\_\_  
area code phone number area code fax number  
EMAIL ADDRESS: Alkarak@aol.com

CONFIRMED FILE DATE: 10/22/2015

Certified Document Number: 67560361 - Page 1 of 1



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67560361 Total Pages: 1

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 9

CONFIRMED FILE DATE: 10/30/2015

10-23-15  
1043

541

491X

5

22

Jordy McKay

G.H.

P3

CAUSE NO. 201563015

AFFIDAVIT OF INABILITY  
TO PAY COST FILED WITH PLEADING.

RECEIPT NO. 19994  
10-22-2015

0.00

CO1

TR # 73181212

PLAINTIFF: KARAALI, ALPER

vs.

DEFENDANT: UBER TECHNOLOGIES INC

In The 151st  
Judicial District Court  
of Harris County, Texas  
151ST DISTRICT COURT  
Houston, TX

CITATION

THE STATE OF TEXAS  
County of Harris

TO: UBER TECHNOLOGIES INC  
5714 STAR LANE HOUSTON TX 77057

FILED  
Chris Daniel  
District Clerk  
OCT 30 2015  
Time: 8:00  
By: [Signature] Deputy  
Harris County, Texas


Attached is a copy of PLAINTIFF'S ORIGINAL PETITION

This instrument was filed on the 22nd day of October, 2015, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:  
This citation was issued on 22nd day of October, 2015, under my hand and seal of said Court.

Issued at request of:  
KARAALI, ALPER  
538 IVY CROSS LANE  
SUGAR LAND, TX 77479



Chris Daniel  
CHRIS DANIEL, District Clerk  
Harris County, Texas  
201 Caroline Houston, Texas 77002  
P.O. Box 4651, Houston, Texas 77210

Bar No.: 1

GENERATED BY: CHAMBERS, WANDA RENE ULW/9YN/1022411

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at \_\_\_\_\_ o'clock \_\_\_\_\_ .M., on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Executed at (address) \_\_\_\_\_ in \_\_\_\_\_ County at \_\_\_\_\_ o'clock \_\_\_\_\_ .M., on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by delivering to \_\_\_\_\_ defendant, in person, a true copy of this Citation together with the accompanying \_\_\_\_\_ copy(ies) of the \_\_\_\_\_ Petition attached thereto and I endorsed on said copy of the Citation the date of delivery. To certify which I affix my hand officially this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Fee: \$ \_\_\_\_\_

\_\_\_\_\_ of \_\_\_\_\_ County, Texas

By \_\_\_\_\_ Deputy

Affiant

On this day, \_\_\_\_\_, known to me to be the person whose signature appears on the foregoing return, personally appeared . After being by me duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

WORN TO AND SUBSCRIBED BEFORE ME, on this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.


Notary Public

Certified Document Number 112 - Page 1 of 3

N.INT.CITR.P



RECORDER'S MEMORANDUM  
This instrument is of poor quality  
at the time of imaging



**Cause #:** 201563015

**Tracking #:** 73181212

**Person To Serve:** UBER  
TECHNOLOGIES INC

**Constable Return of Corporation**

Cause #: 201563015

Tracking #: 73181212

In the case of KARAALI, ALPER VS UBER TECHNOLOGIES INC a CITATION and attached    was issued by the 151st district court of Harris County, and came to hand on the 27 day of October, 2015 at 12:19PM to be delivered at 5714 Star Lane, Houston, TX 77057 by delivering to: UBER TECHNOLOGIES INC

---

**Service of Corporation**

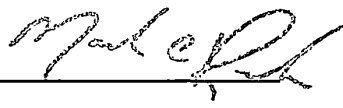
Executed the same in Harris County, Texas, on the 28 day of October, 2015 at 10:43AM by summoning UBER TECHNOLOGIES INC a Corporation at 5714 Star Lane, Houston, Texas 77057 By delivering to JORDAN WRAY in person the manager of said Corporation a true copy of this CITATION, together with the accompanying certified copy of the   

---

Fee \$ NF

by Deputy Mark Richie

Printed

Deputy Signature 

Attempts: 1

**Phil Camus , Constable Precinct #5**

**Harris County Texas**

17423 Katy Freeway  
Houston, Texas 77094

**FILED**

**Chris Daniel  
District Clerk**

**OCT 30 2015**

Time: 800  
Harris County, Texas

By   
Deputy



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 3, 2015

Certified Document Number: 67694112 Total Pages: 3

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 10

NO. 2015-63015

ALPER KARAALI,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
UBER TECHNOLOGIES, INC.,	§	
	§	
Defendant.	§	151 JUDICIAL DISTRICT

---

**DEFENDANT'S ORIGINAL ANSWER  
AND AFFIRMATIVE DEFENSES**

---

Defendant Uber Technologies, Inc., ("Defendant" or "Uber") files its Original Answer to Plaintiff's Original Petition and shows the Court as follows:

**I.  
GENERAL DENIAL**

As authorized by Rule 92 of the Texas Rules of Civil Procedure, Defendant enters a general denial of the matters pleaded in Plaintiff's Original Petition and requests the Court require Plaintiff to prove each of his charges, claims, and allegations by a preponderance of the evidence or clear and convincing evidence as required by the Constitution and the laws of the State of Texas. Defendant respectfully requests that it be allowed to plead further and additional defenses in this cause as the facts surrounding this matter are developed.

**II.  
ADDITIONAL DEFENSES**

By way of further answer, and without limiting in any way its general denial, Defendant pleads the following additional defenses. To the extent any defense or legal theory may be interpreted as inconsistent, such defenses or legal theories are pled in the alternative.

**FIRST DEFENSE**

Defendant pleads that Plaintiff's claims are subject to a valid, binding, and enforceable arbitration agreement.

**SECOND DEFENSE**

Defendant pleads that Plaintiff's Original Petition should be dismissed, in whole or in part, for his failure to state a claim upon which relief can be granted.

**THIRD DEFENSE**

Defendant pleads that Plaintiff's claims are barred, in whole or in part, by his failure to comply with the applicable statutes of limitation.

**FOURTH DEFENSE**

Defendant pleads that Plaintiff has failed to allege facts sufficient to state a claim for punitive damages.

**FIFTH DEFENSE**

Defendant pleads that Plaintiff's damages are limited by all applicable damages caps and limitations provided by law, including Chapter 41 of the Texas Civil Practice and Remedies Code and all other similar limitations.

**SIXTH DEFENSE**

Defendant pleads that Plaintiff's damages, if any, were not caused by Defendant, rather they were caused by Plaintiff or third parties.

**SEVENTH DEFENSE**

Defendant pleads that no act or omission on their part proximately caused any of Plaintiff's alleged injuries or damages.

**EIGHTH DEFENSE**

Defendant pleads that Plaintiff's tortious interference with an existing contractual relationship claim should be dismissed because Plaintiff fails to allege any facts which support that Defendant willfully or intentionally interfered with any valid contract between Plaintiff and a third party.

**NINTH DEFENSE**

Defendant pleads that Plaintiff has failed to mitigate any and all damages, and that Defendant is entitled to an offset for any amounts earned by Plaintiff or which Plaintiff should have earned.

**TENTH DEFENSE**

Defendant pleads that Plaintiff's claims are barred by Plaintiff's waiver and consent.

**ELEVENTH DEFENSE**

Defendant pleads that Plaintiff is not a "consumer" within the meaning of the Texas Deceptive Trade Practices Act.

**TWELFTH DEFENSE**

Defendant pleads that Plaintiff neither sought nor acquired goods or services by purchase or lease within the meaning of the Texas Deceptive Trade Practices Act.

**THIRTEENTH DEFENSE**

Defendant pleads that it owed no duty to Plaintiff.

**FOURTEENTH DEFENSE**

Defendant pleads that it made no material misrepresentation to Plaintiff.

**FIFTEENTH DEFENSE**

Defendant reserves the right to assert additional defenses that may become apparent during the defense of this case.

**CONCLUSION**

Defendant respectfully requests judgment of the Court that Plaintiff take nothing by this suit and that Defendant recover all costs and attorney fees together with any further relief to which Defendant may be entitled.

Dated: November 20, 2015

Respectfully submitted,

/s/ Jonathan G. Rector

Vicki L. Gillette, Bar No. 08957325

[vgillette@littler.com](mailto:vgillette@littler.com)

Jonathan G. Rector, Bar No. 24090347

[jrector@littler.com](mailto:jrector@littler.com)

LITTLER MENDELSON, P.C.

2001 Ross Avenue

Suite 1500, Lock Box 116

Dallas, TX 75201.2931

ATTORNEYS FOR DEFENDANT  
UBER TECHNOLOGIES, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2015, the foregoing was filed with the Clerk of the Court using the CM/ECF system and served upon Plaintiff via certified mail, return receipt requested, to the following:

Alper Karaali  
538 Ivy Cross Lane  
Sugar Land, TX 77479

/s/ Jonathan G. Rector

Jonathan G. Rector



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.  
Witness my official hand and seal of office this November 23, 2015

Certified Document Number: 67978911 Total Pages: 4

Chris Daniel, DISTRICT CLERK  
HARRIS COUNTY, TEXAS

**In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail [support@hcdistrictclerk.com](mailto:support@hcdistrictclerk.com)**

# Exhibit 11

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**ALPER KARAALI,**

**Plaintiff,**

**v.**

**UBER TECHNOLOGIES, INC.,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. \_\_\_\_\_**

**DECLARATION OF MICHAEL COLMAN IN SUPPORT OF DEFENDANT'S  
REMOVAL OF CIVIL ACTION FROM STATE COURT**

I, MICHAEL COLMAN, hereby declare and state:

1. I am currently an Operations Specialist for Defendant Uber Technologies, Inc. ("Uber"), and I work out of Uber's San Francisco location. I have been employed by Uber since October 19, 2011, and have worked as an Operations Specialist since February 2013. In this role, I consult with local operations teams about various aspects of Uber's operations and I have comprehensive personal knowledge of Uber's general business model. I have personal knowledge of the facts set forth in this Declaration, and I can and would testify to those facts if called and sworn as a witness.
2. Uber is a privately held corporation incorporated in the State of Delaware. Its headquarters and principal place of business is in San Francisco, California. Uber's primary administrative and financial functions, including human resources, benefits and payroll, are all managed at Uber's headquarters in San Francisco.

**DECLARATION OF MICHAEL COLMAN IN SUPPORT OF  
DEFENDANT'S REMOVAL OF CIVIL ACTION FROM  
STATE COURT – PAGE 1**

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed at San Francisco, California, this 23 day of November 2015.

  
\_\_\_\_\_  
MICHAEL COLMAN

Firmwide:137126788 | 073208 | 108

# Exhibit 12

CAUSE NO. 2015-63015

ALPER KARAALI,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
UBER TECHNOLOGIES, INC.,	§	
	§	
Defendant.	§	151ST JUDICIAL DISTRICT

**DEFENDANT UBER TECHNOLOGIES INC.'S NOTICE OF FILING REMOVAL**

Defendant Uber Technologies, Inc. (“Defendant”), by and through its undersigned counsel, hereby gives notice to the 151st Judicial District Court as follows:

1. On November 24, 2015, Defendant filed a Notice of Removal with the United States District Court for the Southern District of Texas, Houston Division. A copy of the Notice of Removal is attached hereto as Exhibit A.

2. In accordance with the provisions of 28 U.S.C § 1446(d), the filing of the Notice of Removal by Defendant in the United States District Court for the Southern District of Texas, Houston Division, effects the removal of this action from this Court’s jurisdiction, and this Court “shall proceed no further unless and until the case is remanded” by the federal court. 28 U.S.C. § 1446 (d).

Dated: November 24, 2015

Respectfully submitted,

/s/ Jonathan G. Rector

Vicki L. Gillette  
Texas Bar No. 08957325  
[vgillette@littler.com](mailto:vgillette@littler.com)  
Jonathan G. Rector  
Texas Bar No. 24090347  
[jrector@littler.com](mailto:jrector@littler.com)

LITTLER MENDELSON, PC  
2001 Ross Avenue  
Suite 1500, Lock Box 116  
Dallas, TX 75201-2931  
214.880.8100  
214.880.0181 (Facsimile)

ATTORNEYS FOR DEFENDANT  
UBER TECHNOLOGIES, INC.

**CERTIFICATE OF SERVICE**

On November 24, 2015, I electronically submitted the foregoing document with the clerk of the 151st Judicial District Court of Harris County, Texas, using an Electronic Filing System Provider (EFSP). I hereby certify that I have served the following *pro se* party of record by certified mail, return-receipt requested, pursuant to Texas Rule of Civil Procedure 21a:

Alper Karaali, *pro se*  
538 Ivy Cross Lane  
Sugar Land, TX 77479

s/ Vicki L. Gillette  
Vicki L. Gillette